



CF Fresh

Organic & Transition Fruits, Vegetables & Commodities

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August 1, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW Room 4008
So. Ag. Stop 0268
Washington, DC 20250

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Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. CF FRESH supports the continued allowance of the following substance(s):

Name of Substance	Location on National List (ie. 205.605(a))	Reason for continued allowance.	Supporting Documents (example: research data or other international organic programs)
Lime Sulfur	205.601 (e) (5); (i) (5)	Explanation follows.	
Elemental Sulfur	205.601 (e) (4); (j) (2)	Explanation follows.	
Hydrated Lime	205.601 (i) (3)	Explanation follows.	

Hydrated lime and elemental sulfur are used in the production of Lime Sulfur Solution. Lime sulfur is an essential product used on several thousand acres of apples, grapes, peaches, blueberries, and other tree and vine crops to control fungus, mites and insects. This product has Organic Materials Review Institute approval and has been used by large and small growers. In some cases, lime sulfur is the only available product organic

growers have to control the above pests. Lime sulfur has been used successfully for about 200 years with no recorded form of resistance.

Enclosed please find answers to the Federal Register worksheet as voluntarily provided by the manufacturer Best Sulfur Products, a division of Ag Formulators, Inc., that support this petition.

Sincerely,

A handwritten signature in black ink, appearing to read "Luis H. Acuña", is positioned to the left of a vertical red line.

Luis H. Acuña
Vice-President & Director

Cc: Organic Trade Association
National Organic Standards Board

Attachment: "Evaluation Criteria for Substances Added to the National List"